

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

INTELLECTUAL VENTURES I LLC AND
INTELLECTUAL VENTURES II LLC,

Plaintiffs,

-against-

CITIGROUP, INC., CITICORP, and CITIBANK,
N.A.,

Defendants.

14 Civ. 4638 (AKH)

ECF CASE

JURY TRIAL DEMANDED

**DEFENDANTS' NOTICE REGARDING INSTITUTION OF
INTER PARTES REVIEW FOR U.S. PATENT NO. 5,745,574**

Defendants Citigroup, Inc., Citicorp, and Citibank, N.A. (collectively "Citi") hereby provide notice to the Court that on October 20, 2014, the United States Patent & Trademark Office ("USPTO") instituted *inter partes* review ("IPR") of United States Patent No. 5,745,574 ("the '574 Patent") based on a petition for IPR filed by non-party International Business Machines Corporation ("IBM"). The USPTO instituted IPR of Claims 18-31 (the "Challenged Claims") of the '574 Patent, and determined that there is a reasonable likelihood that IBM would prevail in showing the Challenged Claims were invalid. *See* Ex. A, IPR2014-00660 (instituting IPR on Claims 18-31); *see also* Ex. B, IPR2014-01410 (instituting IPR of Claim 30 and consolidating the IPR with IPR2014-00660). Additionally, on November 6, 2014, the USPTO instituted IPR of the same claims based on a petition filed by non-parties Compass Bank, Commerce Bancshares, Inc., and First National Bank of Omaha. *See* Ex. C, IPR2014-00724 (instituting IPR of Claims 18-31). Oral arguments for all proceedings is scheduled for June 11, 2015.

Citi did not participate in, control, support, or pay for the preparation or filing of these petitions. Citi will provide further notice to the Court upon receipt of any information regarding further actions taken by the USPTO.

Dated: June 3, 2015

Respectfully submitted,

/s/ Brent P. Ray

KIRKLAND & ELLIS LLP

Brent P. Ray
David W. Higer
300 North LaSalle Street
Chicago, IL 60654
Telephone: (312) 862-2608
Facsimile: (312) 862-2200
brent.ray@kirkland.com
dhiger@kirkland.com

Kenneth R. Adamo
601 Lexington Avenue
New York, NY 10022-4611
Telephone: (212) 446-4839
Facsimile: (212) 446-4900
kenneth.adamo@kirkland.com

**WILMER CUTLER PICKERING HALE &
DORR LLP**

Gregory H. Lantier
Richard A. Crudo
1875 Pennsylvania Ave, NW
Washington, DC 20006
Telephone: (202) 663-6000
Facsimile: (202) 663-6363
gregory.lantier@wilmerhale.com
richard.crudo@wilmerhale.com

Robert W. Trenchard
Omar A. Khan
7 World Trade Center
250 Greenwich Street

New York, NY 10007
Telephone: (212) 230-8800
Facsimile: (212) 230-8888
robert.trenchard@wilmerhale.com
omar.khan@wilmerhale.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that I caused a true and correct copy of the foregoing document to be served via the CM/ECF system of the U.S. District Court for the Southern District of New York on all counsel of record on June 3, 2015.

/s/ Brent P. Ray

Brent P. Ray